

# **Allegan County Administrative Services**



County Services Building  
3283 122<sup>nd</sup> Avenue  
Allegan MI 49010

December 17, 2015

United States Environmental Protection Agency  
Attn: Mr. Matthew Didier  
77 West Jackson Boulevard  
Mail Code SE-7J  
Chicago, IL 60604-3507  
Phone 312- 353-2112

Subject: FY 2016 Brownfield Community-wide Assessment Grant Application, Allegan County, Michigan

Dear Mr. Didier,

Allegan County, Michigan (the "County") is submitting the enclosed application for a U.S. EPA Brownfields Community-wide Assessment Grant - \$200,000 for hazardous substances and \$200,000 for petroleum (total of \$400,000) funds for assessment activities primarily along the Kalamazoo River corridor. Allegan County, Michigan is an eligible applicant.

Allegan County's primary economic sectors are agriculture, tourism and manufacturing. While agriculture and tourism have flourished, manufacturing has suffered over the past 25 years. A majority of the manufacturing in the County is located along the Kalamazoo River corridor which bisects the center of the County and discharges into Lake Michigan. For this project, the Target Community is comprised of the portion of the Kalamazoo River corridor consisting of 40 miles of riverfront that passes through the communities of Douglas, Allegan, Otsego and Plainwell (downstream to upstream). In each of these 4 communities, a catalyst brownfield site, as well as the areas adjacent to these sites, has been identified as a high priority for redevelopment. These catalyst sites include a former office furniture manufacturing facility, which was once one of the County's largest employers, a privately owned marina and waterfront area that is being planned as a public marina, a historic mill and downtown area, an abandoned paper mill that is not included as part of the Kalamazoo River Superfund Site, and a junkyard along a mill race of the river. Each of these catalyst brownfield sites has the potential to spur significant environmental improvements and economic development within the Targeted Community.

Concurrent with the economic downturn and lack of brownfield redevelopment opportunities, there are several other regional environmental issues that have delayed redevelopment in the Targeted Community. The County is undergoing a Superfund cleanup of the Kalamazoo River sediments, seeking solutions to manage the accumulation of polychlorinated biphenyls (PCBs) behind the dam and in the Saugatuck-Douglas Harbor from defunct paper mills, and facilitating the cleanup of PCBs in dredged sediment that has been placed in storage areas. Receiving an EPA Brownfield Community-wide Assessment Grant in conjunction with completion of the Superfund cleanup would significantly add momentum to the County's revitalization in the Targeted Community.

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The County is pleased to provide the applicant information for this grant:

- a. **Applicant** Allegan County, Michigan  
Address: 3283 122<sup>nd</sup> Avenue  
Allegan, Michigan 49010  
Phone: 269-673-0250 Fax: 269-686-5331  
Website: [www.allegancounty.org](http://www.allegancounty.org)
- b. **DUNS Number** 83-170-9287
- c. **Funding Requested:**  
**Grant Type:** Assessment  
**Federal Funds Requested:** \$400,000  
**Contamination:** \$200,000 Hazardous Substances and \$200,000 Petroleum  
**Assessment Grant:** Community-wide
- d. **Location:** Allegan County, Michigan
- e. **Site Specific Proposal:** Not Applicable
- f. **Contacts:** **Project Director:** Nora Balgoyen-Williams, Director of Economic Development  
Allegan County, Michigan  
3255 122<sup>nd</sup> Ave., Suite 101  
Allegan, MI 49010  
Phone: 269-686-5311 Fax: 269-686-5214  
Email: [nbalgoyen@allegancounty.org](mailto:nbalgoyen@allegancounty.org)
- Highest Ranking Elected Official:** Mark DeYoung, Chairman  
3283 122<sup>nd</sup> Avenue  
Allegan, Michigan 49406-0757  
Phone: 269-673-0205 Fax: 269-673-686-5331  
Email: [mdeyoung@allegancounty.org](mailto:mdeyoung@allegancounty.org)
- g. **Date Submitted:** December 18, 2015
- h. **Project Period:** October 1, 2016 through September 1, 2019
- i. **Population:** 111,742 (in 2013)
- j. **Special Consideration:** A checklist is attached (Other Factors).

The County welcomes the opportunity to work with the U.S. EPA on its brownfield initiative. Thank you for your time and consideration.

Sincerely,

  
Mark DeYoung, Chairman  
Allegan County Board of Commissioners

### Appendix 3

## Regional Priorities Form/Other Factors Checklist

Name of Applicant: \_\_\_\_\_

### *Regional Priorities Other Factor*

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.E, please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

\_\_\_\_\_

Page Number(s): \_\_\_\_\_

### *Assessment Other Factors Checklist*

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Targeted brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	
Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	

	<p>Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a “manufacturing community” designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, <b>applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation</b> which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient’s IMCP proposal which lists/describes the core partners and implementation strategy parties.</p>	
	<p>Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, <b>applicant must attach documentation.</b></p>	
	<p>Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.</p>	

**APPLICATION FOR FY16 USEPA BROWNFIELDS COMMUNITY-WIDE ASSESSMENT GRANT  
ALLEGAN, MICHIGAN**

**1. COMMUNITY NEED**

**a. Targeted Community and Brownfields**

**i. Targeted Community Description**

Allegan County, located on the west coast of Michigan's Lower Peninsula, is approximately 150 miles west-northwest of the City of Detroit and 100 miles northeast of Chicago. The County is primarily rural in nature except for the communities along the Kalamazoo River Corridor (river corridor) which bisects the entire length of the County. Allegan County has a diverse economy that includes farming on rich agricultural land that surrounds city centers, tourism and recreation along 30 miles of Lake Michigan shoreline, including a port, and a manufacturing hub on the eastern half of the County. Historically manufacturing within the County was centered on the paper industry which was the main economic driver in the 20<sup>th</sup> century for the County. While these facilities are still present, most are now functionally obsolete and provide little economic value in their current state. The Targeted Community consists of communities along the river corridor that have several of these obsolete facilities. The communities are, from downstream to upstream, the cities of Douglas, Allegan, Otsego and Plainwell. It is expected that a majority of the assessment activities will be performed in these communities as well as in connection points associated with the river corridor between these cities.

During the 1800's, the river was used for waterpower, commerce, navigation and fisheries. Officially established in 1855, Allegan County continued to grow, prompting the construction of hydroelectric dams along the river, which was the primary source of power generation by the early 1900's. Between the 1940's through the 1980's, the river played a pivotal role in developing a thriving manufacturing sector, specifically the paper industry. While the river has been a defining asset and has played an important role in the County's growth and development, it has also been used to dispose of wastes resulting in the degradation of water quality and sediment, particularly wastes associated with polychlorinated biphenyls (PCBs) in the Kalamazoo River. With the decline of the U.S. paper industry starting in the late 1980's, several mills eventually closed leaving a legacy of polychlorinated biphenyls (PCBs) contaminated sediments that have accumulated behind dams and along the 80 miles of river from the City of Kalamazoo to its discharge point into Lake Michigan. With to the widespread PCB contamination of fishes in the Kalamazoo River, this stretch of the river was designated as a federal Superfund Site in 1990 (for fish consumption). **This grant request is not associated with the Superfund cleanup of the river sediments which is an ongoing project of the EPA.** The EPA Superfund cleanup of the river has been systematic, beginning with the PCB source areas within and near the City of Kalamazoo and progressing downstream through Kalamazoo County and eventually Allegan County. Allegan County residents have the expectation that their portion of the river will also be cleaned up; however, it has taken 25 years for the planned cleanup activities to reach Allegan County. As a result, the momentum of any redevelopment plans to repurpose the underutilized industrial properties within the Targeted Community have been seriously reduced. Furthermore, funding for the Superfund cleanup activities is running out and the limited concentration of PCBs that are substantially less downstream than the source areas upstream will likely not be addressed as they are below actionable levels, leaving the County and the Targeted Community with the stigma associated with the Superfund designation, as well as the cost for managing any PCB sediments removed from the river as part of dredging or construction activities.

Concurrent with the economic downturn and lack of brownfield redevelopment opportunities, there are several other regional environmental issues that have delayed redevelopment in the Targeted Community.

The County is undergoing a Superfund cleanup of the Kalamazoo River sediments, seeking solutions to manage the accumulation of polychlorinated biphenyls (PCBs) behind the dam and in the Saugatuck-Douglas Harbor from defunct paper mills, and facilitating the cleanup of PCBs in dredged sediment that has been placed in storage areas. Receiving an EPA Brownfield Community-wide Assessment Grant in conjunction with completion of the Superfund cleanup would significantly add momentum to the County's revitalization of the Targeted Community.

The County recognizes that future economic development and growth is dependent on the Kalamazoo River as the economic driver. It serves as the common link between the County's main urban cities where most of the manufacturing sector is based, the rural irrigation needs of the agricultural industry, and the tourism and recreation opportunities especially at the confluence of the river and Lake Michigan. In establishing the river corridor areas as the Targeted Community, the County is taking the lead to identify and assess sites in these key areas and is working to incorporate brownfield redevelopment and place-making principles as the drivers for achieving their economic development planning goals.

## ii. Demographic Information (5)

	Douglas	Allegan	Otsego	Plainwell	Allegan County	Michigan	National
Population	1,080 <sup>1</sup>	5,008 <sup>1</sup>	3,965 <sup>1</sup>	3,805 <sup>1</sup>	111,742 <sup>1</sup>	9,886,095 <sup>1</sup>	311,536,594 <sup>1</sup>
Unemployment	6.1% <sup>1</sup>	8.0% <sup>1</sup>	16.3% <sup>1</sup>	15.4% <sup>1</sup>	9.0% <sup>2</sup>	6.7% <sup>2</sup>	5.1% <sup>2</sup>
Poverty Rate	2.8% <sup>1</sup>	13.9% <sup>1</sup>	11.5% <sup>1</sup>	10.0% <sup>1</sup>	10.2% <sup>1</sup>	12.0% <sup>1</sup>	11.3% <sup>1</sup>
Percent Minority	2.8% <sup>1</sup>	3.5% <sup>1</sup>	4.0% <sup>1</sup>	8.1% <sup>1</sup>	10.6% <sup>1</sup>	23.7% <sup>1</sup>	36.7% <sup>1</sup>
Per Capita Income	\$29,981 <sup>1</sup>	\$20,203 <sup>1</sup>	\$19,605 <sup>1</sup>	\$19,498 <sup>1</sup>	\$24,140 <sup>1</sup>	\$25,681 <sup>1</sup>	\$28,155 <sup>1</sup>
Median Household Income	\$40,526 <sup>1</sup>	\$42,318 <sup>1</sup>	\$38,967 <sup>1</sup>	\$41,863 <sup>1</sup>	\$52,061 <sup>1</sup>	\$60,793 <sup>1</sup>	\$53,046 <sup>1</sup>

<sup>1</sup>Data are from the 2009 – 2013 American Community Survey and are available on American Fact Finder at [http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_13\\_5YR\\_DP03&src=pt](http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_13_5YR_DP03&src=pt) and [http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_13\\_5YR\\_DP05&prodType=table](http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_13_5YR_DP05&prodType=table)

<sup>2</sup>Data are from the Bureau of Labor Statistics and are available at [www.bls.gov](http://www.bls.gov).

## iii. Description of Brownfields

There are number of catalyst brownfield sites within the Targeted Community that have the potential to invigorate redevelopment. At least one catalyst brownfield site has been identified in each of the cities within the Targeted Community for assessment and/or cleanup planning activities. Redevelopment of these catalyst sites will also spur other brownfield redevelopment projects in adjacent areas. The catalyst sites include a former office furniture manufacturing facility, which was once one of the County's largest employers, and surrounding brownfield sites; a privately owned marina and waterfront area that is being planned as a public marina; a historic mill and downtown area; an abandoned paper mill which is not part of the Kalamazoo River Superfund Site; and a junkyard along a mill race of the river. The ownership of each catalyst brownfield is in various stages of the redevelopment process from merely being for sale, to being in the process of purchase and remediation. In addition to these key sites, there is a strong desire to develop linear greenspace as park areas along the river to provide connectivity and place-making opportunities between the communities. A brief description of each these catalyst brownfield sites are included below:

### The City of Douglas Gateway Area - City of Douglas (60 acres)

The City of Douglas Gateway Area (Gateway Area) consists of approximately 7 parcels that are in various stages of ownership transfer, or are for sale. The City's new Master Plan has identified this Gateway Area to become "connected" with the existing downtown area approximately ¼ mile away. The centerpiece of the Gateway Area is a former office furniture manufacturing site which was recently (November 2015) sold to a developer. In 2010, this facility ceased operations, eliminating 110 jobs and a significant source of tax revenue to both the City and the County. It is expected that this site will remain partially industrial with

some areas also being redeveloped as commercial space. A Phase I /II ESA was completed for the site and indicated that there is an off-site contaminated groundwater plume migrating to a tributary to the Kalamazoo River, prompting the need for vapor mitigation of the source area under the building. The City of Douglas has submitted a grant/loan application (see Attachment 3) for the design and installation of the vapor mitigation system. The State of Michigan is also providing cleanup funds associated with the contaminant plume. Additionally, this brownfield site is centrally located and adjacent to several other priority brownfields in Douglas that are located within 1/8 to 1/2 mile. As these properties are sold, site assessments and cleanup planning will be completed under this grant.

#### Marina Area – City of Douglas (30+ acres)

A private marina is in the process of being purchased by the City. This property and a number of adjacent parcels will become a public-private mixed use development that will include a public marina and residential and commercial developments and will require assessment and cleanup planning. Portions of the existing marina have been used to store dredged sediments contaminated with low level PCBs. It is expected that the public marina will also include opportunities to utilize the contaminated sediment as fill material to be capped beneath buildings, parking areas and green space (EPA greener cleanups approaches) rather than being deposited in off-site landfills.

#### Former Mill Works Area– City of Allegan (20-30 acres)

A historic district in downtown Allegan formerly included a number of mill works (flour, grist, roller, planing, saw and shingle) and is currently in the process of being redeveloped into an arts entrepreneurial startup district. The remaining historic mill structures, vacant buildings and parcels have redevelopment potential, but there is concern that asbestos, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) and metals exist on these properties and will require assessments. The remaining buildings in this area will also require hazardous materials surveys as part of the Phase II ESAs.

A 40 person industrial company on 8 acres in downtown Allegan is currently weighing whether to remain in Allegan or consolidate its operations elsewhere. They are leasing their Allegan facility and purchase of the building will be key if they are to remain. Based on a Phase I ESA that was recently completed, a Phase II ESA will be needed to evaluate potential contaminant issues on the site as they make their decision of whether to remain or relocate in 2016.

#### Former RockTenn Paper Mill – City of Otsego (100+ acres)

The former RockTenn paper mill site (owned by the County via tax foreclosure) and associated surrounding brownfields is located nearby the City of Otsego's downtown district on the banks of the Kalamazoo River. Surrounding brownfields include a former shoe factory, the Department of Public Works facility, and several warehouses that are currently vacant or underutilized. A Phase II ESA has been completed for the paper mill buildings of the former RockTenn paper mill site under the previous EPA Brownfield Community-wide Assessment Grant managed by the County; however, additional parcels adjacent to the main portion of the plant and beneath the mill still require assessment activities. Additionally, a cleanup plan for the entire RockTenn property and surrounding brownfield sites is needed.

#### Former Junkyard – City of Plainwell (6 Acres)

A vacant parcel along the mill race in the City of Plainwell has been utilized for a number of uses, including a junkyard, and is owned by the City. The City has plans to use this property for senior housing once the site, as well as the adjacent site, is assessed and cleaned up. An assessment of these parcels as well as cleanup planning is anticipated.



### Linear Park Opportunities

An important long term goal of the County is to improve place-making opportunities by providing a linear park along the river within the Targeted Community which will provide green space and recreation opportunities for County residents. There is a strong desire to provide connections between Douglas and Saugatuck on the western portion of the County, and Plainwell and Otsego on the eastern portion of the County. The assessment grant program would provide funds to assess these linear corridors and provide cleanup planning as necessary.

Additionally, there are a number of other brownfields that are also of interest for redevelopment to the County. While not perhaps catalyst sites, their redevelopment would still be impactful toward achieving the County's economic development and environmental improvement objectives.

#### **iv. Cumulative Environmental Issues**

Dominating the environmental landscape in Allegan County is the designation of the Kalamazoo River on the National Priorities List (NPL) from the City of Kalamazoo upstream of Allegan County to the discharge of the river to Lake Michigan, a distance of over 80 miles. The NPL listing is based only on the consumption of fish and does not affect other uses of the river. The cumulative effects of industries that have contributed PCBs to the Kalamazoo River have also impaired the river's natural characteristics (beneficial use impairments) leading to its designation by EPA's Great Lakes National Program Office (GLNPO) as a Great Lakes Area of Concern (AOC). Complicating the elimination of the NPL listing and the AOC designation is the ongoing accumulation of PCB-contaminated sediments behind dams used to generate hydroelectric power. The known contaminants causing beneficial use impairments and the identification of the AOCs include bacteria, polychlorinated biphenyls (PCBs), poly-aromatic hydrocarbons (PAHs), metals including mercury, and oils and greases.

#### **b. Impacts on Targeted Community**

Potential, as well as confirmed health impacts have been identified at several of the catalyst brownfield sites/areas within the Targeted Community. At the City of Douglas Gateway Area, historical industrial operations (metal plating) at the site have impacted the groundwater, the down-gradient properties, and Wicks Creek, a tributary of the Kalamazoo River. These impacts eventually led to the closing of a community water well on the adjacent property in the 1940's. The discovery of the trichloroethylene (TCE) plume in the 1980's led to the replacement of the residential and commercial water supply with bottled water until a municipal water system and barrier treatment system preventing off-site contaminant migration could be constructed. Currently, the Michigan Department of Health and Human Services (MDHHS) has identified offsite properties with the potential for elevated TCE in indoor air and MDEQ has identified TCE in Wicks Creek just upstream of the river. Given the volatility of these compounds, they have a high vapor intrusion potential which poses a significant threat to indoor air quality within the current site building and in existing and future basements of downgradient residential and commercial structures. The contaminated plume migrating down-gradient continues to pose a significant health risk to the City's residents.

Chlorinated VOCs are known carcinogens and have acute effects on the respiratory and central nervous systems and have also been associated with toxic effects in the liver and kidney. Acute exposure to TCE and its derivatives can cause cardiac arrhythmias, emphysema, pulmonary fibrosis, and eventually fatal respiratory failure. Continuous exposure, for vinyl chloride in particular, has prompted The U.S. Agency for Toxic Substances and Disease Registry (ATSDR) to categorize vinyl chloride as a mutagen, which affects chromosomal structure, a Group 1 human carcinogen that poses elevated risks of brain, lung, liver and lymphatic tumors, as well as causing major reproductive defects, birth defects and miscarriages (*"Pocket Guide to Chemical Hazards"* U.S. Department of Health and Human Services, 1997). With respect to the adverse health effects these compounds are known to cause, children, the elderly, and pregnant women



are generally more at risk. With the City's median age suggesting an aging population, the contamination may have a targeted impact, causing an increase of COPD and Asthma cases within the elderly population. The potential health risks to children and pregnant women will also discourage new, younger residents from moving into the community. In addition, occupational health hazards may exist for the workforce where TCE contamination potentially exists.

Low level PCBs below Toxic Substances Control Act (TSCA) action levels are present in dredged material on the future municipal marina and mixed-use development site in Douglas. Low level PCBs are possible on properties along the river within the Targeted Community. A known carcinogen, PCBs can also cause liver damage and effect the cognitive development of unborn children.

Asbestos has been identified as part of an EPA Emergency Response at the former RockTenn paper mill. EPA's response included the securing of the powerhouse to reduce the potential exposure of friable asbestos to the general public. Continuous exposure to friable asbestos has been documented to cause malignant mesothelioma in humans.

The lack of assessment data at the other identified catalyst brownfield sites in Allegan, Otsego and Plainwell makes it impossible to know whether these conditions are being exacerbated by contamination associated with the Targeted Community. However, based on the manufacturing history along the river corridor, a reasonable assumption can be made that contaminants exist in these areas and are contributing to potential adverse health effects in these communities. Further, it is reasonable to assume that the existence of contamination in the Targeted Community increases the risk of exposure to the general public.

### **c. Financial Need**

#### **i. Economic Conditions**

The listing of the river on the NPL severely reduced the interest for redevelopment of brownfields within the Targeted Community. While the previous EPA Brownfield Assessment Grant for the County raised awareness and assessed some brownfield sites throughout the County, more resources are needed. Without additional funding, the positive momentum for economic growth that was realized from the EPA Brownfield Assessment Grant completed in 2013 and recent developer interest will be reduced or eliminated, leaving the County and Targeted Community with no other financial alternatives to fund their brownfield programs. As observed in the demographics table (Section 1.a.ii) the four cities in the Targeted Community are lagging approximately 20% behind the rest of the County, State and 33% behind the U.S. in terms of mean household income. Additionally, unemployment is considerably higher than the state and national average except for unemployment in the City of Douglas. However, it can be noted that the City of Douglas has a median age of 54 and is an acknowledged retirement community and a supplier of seasonal employment workers to support the tourism industry. The river corridor has been the hardest hit in the loss of manufacturing jobs and represents the County's best opportunity for growth and economic development.

#### **ii. Economic Effects of Brownfields**

The operations for each of the cities within the Targeted Community are funded mostly by property taxes and state shared revenue. For the four communities that comprise the Target Community, the taxable value has decreased by approximately 13.8% on average since 2006 (information provided by the Allegan County Assessor's Office). For the County, state shared revenue is the second largest source of revenue. It is derived from state sales and gasoline taxes that are dispersed on an annual basis. In Fiscal Year 2013-2014, the County had already experienced a 20% reduction from the previous fiscal year. According to a recent memo prepared by the House Fiscal Agency in September of 2015 ([www.house.mi.gov/hfa](http://www.house.mi.gov/hfa)), expected revenue sharing is determined by a \$2.65 rate per capita, suggesting that the total revenue share for Allegan County will be approximately 17.6% below the revenue share in 2014.

Economic conditions over the past 10 years forced the closing of the manufacturing facility in Douglas (loss of 110 jobs) and the RockTenn paper mill (loss of 150 jobs) in Otsego. Compounded with the reduction of jobs from manufacturing operations related to the paper and the office furniture manufacturing industries, the reduction of the manufacturing work force from 2001 through 2010 was 5,407 representing an estimated 22% reduction of manufacturing jobs in the County (Source: Industry Table EMSI Q3 2015 Data Set reported by The Right Place, Grand Rapids, MI). In the case of the furniture manufacturing facility in Douglas, the City has experienced an estimated annual reduction of \$30,000 in lost tax revenue. In addition, the plant's closing has adversely affected patronage at local restaurants, retailers and service establishments that have previously relied on the daily traffic from the manufacturing workforce. Similar effects have also been experienced at the other catalyst brownfield sites that are currently vacant or underutilized.

## **2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**

### **a. Project Description, Project Timing and Site Selection**

#### **i. Project Description**

In preparation for this grant application submittal the County requested a list of potential brownfield sites for assessments under the grant program from the cities, villages and townships throughout the County. This list, as well as the results of the Community-wide EPA Brownfield Assessment Grant completed from 2009 through 2014, the County has identified a number of catalyst brownfield sites and areas within the Targeted Community (see Section 1.A.iii) that are key for its revitalization. The redevelopment plan for these areas represents opportunities to incorporate a sustainable mix of affordable housing, community recreation, commercial and clean industrial development, and green infrastructure to support community needs. The master planning process is also intended to work in conjunction with the concurrent effort of the delisting the river from the NPL, the elimination of its designation as an AOC and the reduction of sediment runoff to the river from agricultural land. Redevelopment of each of these five catalyst brownfield sites described in Section 1.A.iii. and surrounding areas aligns with the Targeted Community's plans along the river to align with the long term redevelopment vision of the County. Revitalization efforts are intended to take advantage of the growing need for redevelopment in proximity to the river. These opportunities represent the Targeted Community's highest percentage to successfully achieve their economic development objectives.

EPA funding will be primarily be used to complete assessments and cleanup planning. In completing these activities, the County will engage the public throughout the planning and redevelopment process, the goal of which will be the preparation of a prioritized redevelopment plan in harmony with a river corridor master plan consistent with the individual community master plans and NPL delisting for the river corridor from one end of the County to the other. Linking community outreach activities with the community network established through the of the Superfund process (the river), as well as, the master planning process at both the County and local levels will be a key priority. Finally, once the condition of sites in the Targeted Community are known, community outreach activities also will be used to assist the County in the preparation of reuse plans and the identification of feasible cleanup alternatives required to support a phased approach to those plans.

#### **ii. Project Timing**

With the upsurge in developer interest and the desire for place-making activities within the Targeted Community, the timing for this grant is optimal. The County will proceed with procuring an environmental consultant through a competitive process as soon as the grant is awarded by identifying a list of qualified firms with expertise in EPA Brownfield Assessment Grants, brownfield redevelopment projects, and environmental science/engineering. These firms will be invited to provide a scope of work and competitive

pricing for the project. It is expected that the environmental consultant or consultants will be in place within 90 days of the signing of the Cooperative Agreement.

The anticipated assessment tasks under this grant include community outreach, Phase I and Phase II ESAs, and cleanup planning, all of which will be implemented by the selected environmental consultant. Existing community outreach networks will be expanded immediately upon grant award and assessment and cleanup planning activities will begin immediately after EPA approval has been given for the Quality Assurance Project Plan (QAPP). The QAPP is expected to be completed and submitted for EPA approval within 30 days of the County's procurement of an environmental consultant. Additional duties performed by the environmental consultant will be to assist the County with preparing and submitting quarterly progress reports to the EPA over the duration of the grant, secure site access, and provide assistance with technical reporting (ACRES) and guidance as needed.

Because of the active developer interest and redevelopment activity associated with the City of Douglas Gateway Area, the Douglas Marina Area and the City of Allegan Historic Mill District, community outreach, environmental assessments and cleanup planning will largely begin in the first 12 months of the grant program. It is expected that the other priority sites and areas in the Targeted Community such as the RockTenn Paper Mill, City of Plainwell junkyard, and additionally identified sites will be completed in years 2 and 3. Cleanup planning will immediately begin for the two City of Douglas catalyst brownfield projects, while cleanup planning for sites that have no or outdated assessment data will begin after the completion of assessment work for those sites.

### **iii. Site Selection**

Sites and areas consisting of multiple sites have been nominated by communities and the MDEQ based on existing knowledge of environmental impact, location, and developer interest. The nominations for additional sites will continue in the same manner throughout the life of the grant program. As nominations are received the Allegan County Brownfield Redevelopment Authority (ACBRA), acting on behalf of the County, will evaluate the potential sites to determine if they meet the County's revitalization plans and vision and if they do, prioritize the sites based on location, historical chemical use, redevelopment potential and developer interest.

## **b. Task Descriptions and Budget Table**

### **i. Task Descriptions**

The primary use of this grant will be to investigate sites known or suspected of having environmental contamination that the Allegan County communities have identified as having the greatest development potential and impact in the Targeted Community. Funds will primarily be used for Phase II ESA activities. The funds will also be used for ongoing cleanup planning and community outreach activities as they relate to the activities funded by this grant. The specific tasks are:

#### Task 1 – Community Outreach

This task will begin with the community notification of the award. A kick-off event will be conducted that will include key stakeholders, cities, villages and township point contacts and other interested parties from the community, and local and federal government officials. Quarterly meetings with the ACBRA will continue throughout the duration of the grant program. It is estimated that the cost for these meetings, written materials, signage at affected sites, and transportation for tours will be \$29,500. River corridor master planning activities are currently being pursued through other grant or private funding sources and community outreach activities will be merged with similar EPA Brownfield Community-wide Assessment Grant activities.

### Task 2 – QAPP and Environmental Assessments

An Eligibility Determination, a Quality Assurance Project Plan, a Sampling & Analysis Plan (SAP), and a Health & Safety Plan (HASP) will be prepared as part of this task. The Quality Assurance Project Plan (QAPP) will be completed by the environmental consultant(s) selected by the County to complete the environmental investigations and is expected to be \$2,000. Selection of professional consultants will comply with 40 CFR 31.36. The costs for the Eligibility Determination, SAP, and HASP will be included in the Phase I and II ESA costs for individual brownfield sites.

The selected environmental consultant(s) will conduct Phase I and Phase II Environmental Site Assessments at sites known or suspected to be contaminated by hazardous and/or petroleum substances. Phase I ESAs will be completed in accordance with ASTM E1527-13. Phase II ESAs will be completed in accordance with ASTM E1903-11 and with the EPA-approved SAP. At sites planned for demolition or renovation that are suspected of containing lead and/or asbestos, hazardous materials surveys will be conducted in accordance with ASTM Standards. Selection of consultants will comply with procurement provisions contained in 40 CFR 31.36. Costs per activity are:

Activity	Estimated Qty.	Average Cost	Total Cost
Phase I Environmental Site Assessments (Hazardous)	10	\$2,700	\$27,000
Phase I Environmental Site Assessments (Petroleum)	10	\$2,700	\$27,000
Phase II Environmental Site Assessments (Hazardous)	6	\$15,000	\$90,000
Phase II Environmental Site Assessments (Petroleum)	6	\$15,000	\$90,000

- QAPP (\$2,000 total; \$1,000 hazardous substances and \$1,000 petroleum)

The estimated cost to complete this task is \$236,000.

### Task 3 – Cleanup Planning

Once subsurface contamination is assessed, the property will be divided into separate areas of environmental priority and redevelopment potential. Based on the environmental condition, a site will be assigned a rating followed by a reuse and redevelopment potential rating that together will serve as the basis for how and where to phase potential reuse and redevelopment projects. Knowledge of the environmental conditions will also provide a basis for identifying potential cleanup alternatives within a catalyst brownfield area. Due care and cleanup alternatives will be formulated and shared with the public as part of an Analysis of Brownfield Cleanup Alternatives (ABCA), which will form the basis of future reuse plans. The estimated cost to complete this task is \$90,000.

- At least six (6) Documentation of due care reports, 3 hazardous substances and 3 petroleum, at a cost of \$5,000 each. Total cost \$30,000
- At least six (6) Site or redevelopment project area cleanup plans, 3 hazardous substances and 3 petroleum, at a cost of \$10,000 each. Total cost of \$60,000.

### Task 4 – Programmatic Activities

The composition of the requisite Work Plan to EPA along with applicable federal grant application forms is expected to take the grantee 30 hours to complete at a rate of \$50.00 per hour (\$1,500). Travel will be limited to attending the EPA National Brownfield Conference. During the national conference, the County will promote its EPA-funded initiative and resultant opportunities to the development community and

agencies during the transactional forum; the goal of which will be to foster interest in the Targeted Community and the EPA Brownfield Assessment Grant Program.

The County will submit progress reports to the EPA project officer within 30 days after each reporting period. These reports will cover work status, work progress, difficulties encountered, an accounting of financial expenditures, preliminary data results, anticipated activities, and any changes of the key personnel involved with the project. Additionally, the County will report site-specific accomplishments electronically through the EPA's the Assessment, Cleanup and Redevelopment Exchange System (ACRES) reporting system. At the end of the cooperative agreement, a final project report will be prepared and submitted. The final report will summarize accomplishments, expenditures, outcomes, outputs, lessons learned, and any other resources leveraged during the project and how they were used. The County's budget for programmatic activities is based on the following assumptions:

- Completion of Work Plan (\$1,500)
- Attendance of National Brownfields conference at an estimated travel cost of \$2,000 each, totaling \$4,000.
- Completion of 15 reports (12 quarterly progress reports, 2 annual financial/DBE reports), at an average cost \$250 each for a total of \$3,500 and \$5,000 for final report; these costs will be divided equally, \$4,250 hazardous substance and \$4,250 petroleum.

ii. **Budget Table**

Table 4: Hazardous Substances Assessment Budget					
	Task 1: Community Outreach	Task 2: Site Assessments	Task 3: Cleanup Planning	Task 4: Programmatic Activities	Totals
Personnel	\$2,000			\$5,500	\$7,500
Fringe Benefits					\$0.00
Travel				\$2,000	\$2,000
Equipment					\$0.00
Supplies	\$1,500				\$1,500
Contractual	\$26,000	\$118,000	\$45,000		\$189,000
Other					\$0
Subtotals	\$29,500	\$118,000	\$45,000	\$7,500	\$200,000
Table 4: Petroleum Substances Assessment Budget					
Personnel	\$2,000			\$5,500	\$7,500
Fringe Benefits					\$0.00
Travel				\$2,000	\$2,000
Equipment					\$0.00
Supplies	\$1,500				\$1,500
Contractual	\$26,000	\$118,000	\$45,000		\$189,000
Other					\$0
Subtotals	\$29,500	\$118,000	\$45,000	\$7,500	\$200,000
Grand Total	\$400,000				

### **c. Ability to Leverage**

There are additional sources of funding that can be leveraged for the Targeted Community. These sources include the EPA brownfield cleanup programs, the Great Lakes Restoration Initiative (GLRI) for AOCs, MDEQ brownfield and Strategic Water Quality Initiatives Fund (SWQIF), and the ACBRA via potential developer reimbursement. MDEQ has been actively completing cleanup activities in the Douglas Gateway Area and has allocated approximately \$4.1 million through SWQIF since 1989 (see MDEQ letter of commitment in Attachment 3). In 2015, MDEQ specifically contributed \$1.36 million of SWQIF to impede contaminated groundwater from being discharged to the nearby surface waters. Currently, the MDEQ has determined that a vapor mitigation system will be needed for the existing manufacturing building to meet due care obligations for the site's developer. MDEQ has offered \$850,000 in grant/ loan funding for this task (see Attachment 3).

The City of Douglas has been awarded and has received and continues to seek additional funding from state and federal sources that can assist other objectives of the City's Master Plan. For example, the City was awarded a \$23,000 grant from the National Endowment for the Arts Citizen Institute for Rural Design, which funded the creation of a guidebook that established sustainable design objectives for the future development of the City's rural and waterfront areas. The result of this effort leveraged \$30,000 from local and state resources to create a community supported corridor plan for the Blue Star Highway. The plan illustrates the community's vision for the redevelopment of the Blue Star Highway corridor and is currently an integral piece of the City's effort to update the City Master Plan.

In addition to updating the City Master Plan, there are several other planning projects underway which are directly related to the Douglas Gateway and Marina sites described in Section 1.A.iv. A \$50,000 to \$75,000 sub-area planning project that focuses on the revitalization in Douglas which will define the preferred mix of land uses and building forms is currently in process. The scoping of an estimated \$250,000 harbor planning project for the Kalamazoo Lake Harbor and river is also currently in process which will examine engineered solutions to control PCB contaminated river sediments that is diminishing the functional use of the Kalamazoo Lake harbor. The City will be working with the Michigan Economic Development Corporation in pursuit of funding through the Redevelopment Ready Communities Program and the MiPlace Training Initiative to fund portions of the redevelopment of the Target Site and nearby brownfields.

The County has recently contracted with an environmental consultant to complete due care activities of the former RockTenn paper mill in Otsego to better position the property for developer interest. As an incentive, the County is willing to sell the facility at little or no cost in order to foster taxable income and job growth potential at the site.

Additional sources of funding that are not directly related to the EPA's Brownfield Assessment Program also provide prime opportunities to leverage funds from this grant request. The City will continue to seek funding sources that will facilitate property acquisition, sustainable and green infrastructure improvements, transportation improvements, housing enhancements or other activities that will be outlined in the City upcoming master planning process.

In managing the grant, the County and the selected professional consultant will provide programmatic activities (staff time) and community outreach support (staff time and facilities) in the amount of 5% of the overall grant as in-kind services. In addition to the above, County leaders believe that funding for property acquisition, sustainable and green infrastructure improvements, transportation improvements and housing enhancements are all areas of potential opportunity for leveraging the EPA funds sought by this request.



### **3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS**

#### **a. Plan for Involving Targeted Community & Other Stakeholders; and Communicating Project Progress**

The County will engage active community groups at both the local and county levels that have a vested interest of the condition of their community. These stakeholder groups will assist the County by identifying and prioritizing brownfield sites serve as the voice of the County's residents and provide input during redevelopment and cleanup planning efforts. The County will conduct similar public outreach tools that were successful during the last EPA Assessment Grant. They include newsletters, electronic and internet publications, updates through social media, educational sessions, and quarterly progress meetings that will be open to the public, with the minutes of these meetings will be available on-line to all of the stakeholders and attendees. These public meetings will include City/Village Council meetings where the assessment and cleanup planning activities took place and regularly held ACBRA meetings.

##### **i. Community Involvement Plan**

The community involvement plan for involving the Targeted Community and other stakeholders in the planning and implementation of the Assessment Grant project began with a request to communities from the ACBRA to provide a list of priority sites and areas where they would like to see increased redevelopment opportunities and activities. Many of these sites were discussed in Section 1.A.iii. Additionally, there are numerous stakeholder groups have similar planning and implementation goals that have mature community outreach programs that the ACBRA is connecting to on a regular basis. These include the Kalamazoo River Conservancy which provides outreach activities related to the Superfund cleanup of river sediments, the Kalamazoo Lake Harbor Authority (KLHA) which focuses on economic development of the Saugatuck-Douglas Harbor, the City of Douglas master planning process which has focused on the Douglas Gateway Area and the planned public marina area. Members of the ACBRA are planning to regularly attend these stakeholder meetings in order to integrate and collaborate on similar needs throughout the County.

##### **ii. Communicating Progress**

For all meetings, the County will use the available methods to communicate the progress of the projects as well as inform the public and project stakeholders of critical project information and the scheduling of meetings to maximize the input received. These methods include: 1) use of visual aids, brochures, project signage, and other relevant printed materials; 2) the posting of information and project notices utilizing the County's website; and 3) the preparation of announcements in local newspapers and list-servers.

All official discussions and final decisions will come out of regularly-scheduled ACBRA meetings. These meetings are open to the public and are held at a regular time and location. The date, time and location of these meetings will be disclosed at all community outreach meetings held pursuant to this project to encourage public participation in this EPA-funded initiative. Prior to the assessment work of this grant project, one or more public meetings will be held to explain the scope of the grant project as well as how to be engaged throughout the life of the project.

#### **b. Partnerships with Governmental Agencies**

##### **i. Local/State/Tribal Environmental Authority**

As was discussed in Section 2c, the continued partnership between the County and the MDEQ is critical to providing for the safe reuse of priority brownfield sites in the Targeted Community. This partnership has already included the identification of potential priority sites, the sharing of technical information and solutions with regard to cleanup planning, the continued leveraging of funding sources for brownfield redevelopment and related activities, and the continued participation at community meetings (see letter of commitment) to lend a consistent voice to the public at community outreach sessions in order to educate the public and to garner support for the assessment and cleanup planning activities.



## ii. Other Governmental Partnerships

The County and the MDHHS has already formed strong partnership related to potential health issues associated with the former furniture manufacturing site as related to the off-site migration of contaminated groundwater and vapors to a nearby neighborhood in Douglas. Similar conditions may exist on other priority brownfield sites within the County. The County will continue to partner with MDHHS as new brownfield sites are brought to the County for approval of assessment and cleanup planning activities.

### c. Partnerships with Community Organizations

#### i. Community Organization Description & Role

There are numerous stakeholder groups with similar environmental improvement and economic development goals as that of the County and the ACBRA. Some of these organizations include the Kalamazoo River Watershed Council (KRWC), the Kalamazoo Lake Harbor Authority (KLHA), and the Wicks Creek Neighborhood Group. Each of these community organizations played a role in communicating the selected brownfield sites to be assessed and the status of the County's previous EPA Brownfield Assessment Grant and has provided a Letter of Commitment in Attachment 4.

**The KRWC** has played an important role with respect to water management, protection and cleanup of the Kalamazoo River. They have been the lead community organization in developing the 2011 Watershed Management Plan (WMP). A key consideration of the WMP is the long-term sustainability of water resources for human use, including water supply, irrigation, recreational and aesthetic values, maintenance of natural ecosystems, and biodiversity. The KWRC has also played a prominent role in interfacing with the EPA and MDEQ regarding the Superfund cleanup activities, the elimination of BUI's within the AOC, and the Enbridge oil spill in 2010. Because of their involvement in the Superfund cleanup in Kalamazoo County the KWRC will also be an important partner for Allegan County in communicating the importance of redevelopment in the Targeted Community and working to get the Superfund cleanup and delisting of the AOC completed in Allegan County.

**The KLHA** was formed in 2010 as an intergovernmental agency for the purpose of implementing water quality and economic development objectives of the Kalamazoo Lake Harbor which is located just upstream of Lake Michigan and is bordered by the cities of Saugatuck and Douglas and Saugatuck Township. Tourism and recreation are the economic drivers of the harbor area and a key economic region of the County. As residents of the area have put it, *the formation of the KLHA is the first organization that the three communities are working together to solve common issues such as the growing sediment problem in Kalamazoo Lake.* The KLHA is very active and has been very successful in communicating the contaminated sediment issues of Kalamazoo Lake to the public. One of the seeds for the KLHA was a community outreach program that was administered through the previous EPA Brownfield Assessment Grant. The ACBRA will continue to work with the KLHA on City of Douglas priority brownfield sites. In particular, the public marina site which is so important to the economic development of the region and the entire County.

A key partnership that previously assisted with brownfield redevelopment activities in the City of Douglas Gateway Area is the **Wicks Creek Neighborhood Group**, a grass-roots community organization. This group was instrumental within the Targeted Community and neighborhood in 2003 when development of a property adjacent to the Target Site threatened their health and safety. At that time the Wicks Creek Neighborhood Group requested technical assistance from the MDHHS (working together with ATSDR) to educate and inform the public regarding the potential hazards associated with chlorinated solvents and elevated arsenic levels in the soil. Similarly, MDEQ kept the public informed of the TCE plume cleanup activities downgradient of the Target Site. This CO will continue to provide information to the neighborhood

throughout assessment activities in this portion of the Targeted Community. As other priority areas are identified, it is expected that other grass-root organizations will also become important partners.

**ii. Letters of Commitment**

Letters of commitment from governmental and community partners are included in Attachment 4. Each of these partners has provided their support and a description of how they will participate in the project. In some cases, these letters describe leveraged projects that are helping to build momentum for redevelopment of brownfields in the Targeted Community.

**4. PROJECT BENEFITS**

**a. Health and/or Welfare and Environmental Benefits**

**i. Health and/or Welfare Benefits**

Redevelopment of the priority sites identified in Section 1.a.iii will eliminate or contain the contamination residing at brownfield sites that is paramount to the health and safety of the Targeted Community. The TCE plume emanating from the former furniture manufacturing site in Douglas was identified almost 25 years ago and continues to migrate through other brownfield sites to the river. These sites represents the beginning of a new and walkable commercial center within walking distance of more than 400 existing dwelling units and an additional 200-300 dwelling units planned for the next 10 years connecting the waterfront and the existing downtown. Redevelopment will transform the site from a contaminated and obsolete manufacturing site to a vibrant, mixed used commercial center. Furthermore, redevelopment will also provide an opportunity in keeping with place-based, sustainable and smart growth development practices that incorporates a walking lifestyle into every day neighborhood activities.

The other catalyst brownfield sites offer similar health and welfare benefits through the cleanup or containment of PCBs and the Douglas Marina Site, asbestos, VOCs and SVOCs at the former historic mill area in Allegan, PCBs, VOCs and SVOCs at the former RockTenn paper mill in Otsego and metals, VOCs and SVOCs at the former junkyard in Plainwell. All of these sites have the potential to adversely impact their communities and the Kalamazoo River.

**ii. Environmental Benefits**

Resolution of the contamination residing at the catalyst brownfield sites is paramount to the health and safety of the Targeted Community. The elimination or containment of TCE, PCBs, metals and other contaminants in the river corridor provides improved water quality in the river and opportunities to reduce sediment loading which is contributing the degradation of the river behind the dams and at the mouth of the river. The success of these goals is also in parallel to the delisting criteria of the river's AOC designation.

Another by-product of the grant program (leveraging) will be opportunities to help reduce sediment run-off from agricultural land. This has also become a large target issue for the County as PCBs are transported downstream via soil runoff/sediment to the dams and natural impoundments downstream. Working on the issues together to cleanup and redevelop brownfield sites, increase connectivity and access to the river, reduce sediment loading to the river and seeking Superfund cleanup funding to the river itself are all important components in the redevelopment and economic prosperity for the County.

**b. Environmental Benefits From Infrastructure Reuse/Sustainable Reuse**

**i. Policies, Planning, and Other Tools**

As stated in Section 2.c, the County and Target Communities will continue to seek additional funding from state and federal sources that can assist other objectives of local community master plans. The County and Targeted Community will utilize the several tools that were developed previously as a foundation for redevelopment planning. The guidebook that established sustainable design objectives for the future

development, the community supported corridor plan for the Blue Star Highway, and the goals and objectives that are being defined in the Master Plan in the City of Douglas serve as good examples.

Specific to the catalyst site in Douglas, MDEQ has determined that a destructive green technology could be used to treat the contaminant plume emanating from the site in Douglas. This green remediation practice could accelerate the remediation process without adversely impacting future site users. Should demolition of the building be a part of the program, demolition material will be reused on-site or recycled. Additionally, a number of wells associated with the existing sparge-vent system infrastructure can be reused as groundwater monitoring wells or for future delivery wells for improved groundwater treatment system.

**ii. Integrating Equitable Development or Livability Principles**

With the size of brownfields that exist in the Targeted Community, livability principles and equitable development become important concepts for incorporation into brownfield redevelopment projects. Transportation and utility improvements, equitable housing and recreational opportunities, waterfront access and improved economic development opportunities are the main livability principles that will be addressed in the redevelopment of these brownfield projects. Several of these principles, which have included place-making strategies, have already been implemented on projects within the Targeted Community and the County. Within the Targeted Community there is a strong desire by the communities along the river to connect via a linear trail. Future cleanup and redevelopment activities will improve the water and ecological quality of the Kalamazoo River, incorporate low impact development principles for stormwater management, and improve the connectivity of green space and enhance the reuse opportunities within the Targeted Community. Due to the manufacturing and disposal legacies along the river, it is expected that some of the grant program funds will be used to assess key river corridor sites and provide cleanup planning activities as necessary.

**c. Economics and Community Benefits (long-term benefits)**

**i. Economic or Other Benefits**

The estimated investment for the City of Douglas Gateway and Public Marina projects are \$20 million and \$30 million, respectively. With the completion of these redevelopment projects also comes increased employment and an expanded tax base. The estimated tax revenue increase for these 2 redevelopment areas is \$2.5 million/year. While the RockTenn catalyst area and City of Allegan catalyst areas are not as far along to make such predictions, their similarity to the site in Douglas suggests these sites have the same economic potential.

**ii. Job Creation Potential: Partnerships with Workforce Development Programs**

Most of the sites listed in Section 1.A.iii are too early in the redevelopment process to provide an estimate of the number of jobs created. For the Douglas site, it is estimated that redevelopment of the site will provide an opportunity to replace the more than 100 jobs lost and the loss in tax revenues as a result of the manufacturing plant closing. Given the similarity of the other sites with the Douglas site, as well as the negative impact their closure has had on the surrounding communities, redevelopment of these sites are expected to have similar job creation estimates.

To meet the demand for a skilled workforce, Allegan County has initiated two important initiatives; the Allegan Area STEM Partnership and the Early College/Allegan County. The STEM partnership engages educators and employers to create a county-wide system of STEM activities from an early age through post-secondary. For Early College, high school students are given college level course opportunities beginning their junior year. These programs are providing job opportunities for Allegan County compete for and retain talent. The County's Director of Economic Development, Nora Balgoyen-Williams, will be the County's Project Manager for this grant program and brings 20 years of workforce development as an added benefit to ensuring that there is a workforce available to meet the demands of successful economic

development. To demonstrate its support of local businesses, together with the government's goal of supporting disadvantaged business enterprises with public funds, the County will seek opportunities to include qualified Small Business Enterprises, Disadvantaged Business Enterprises, Woman's Business Enterprises, Minority-owned Business Enterprises, Service Disabled Veteran Owned Small Businesses, and other small/local partnering businesses among its project team.

## **5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

### **a. Programmatic Capability**

The ACBRA will administer the grant program. In administering the project, the County's management team will include Allegan County's Director of Economic Development and the Grants Coordinator. Both the Director of Economic Development and the Grants Coordinator were responsible for completion of the \$400,000 EPA Brownfield Community-wide Assessment Grant awarded to the County in 2009. The Director of Economic Development is also the Director of the ACBRA and will serve as the overall Project Manager to ensure the project's outputs, outcomes, and schedule are met in accordance with the EPA approved work plan. The Grants Coordinator will manage all financial requirements of the project and be responsible for tracking the progress of the grant project to ensure completion of the identified objectives and tasks identified in the work plan. The Grants Coordinator is charged with managing a number of grants for the County in this fashion, including the recently completed EPA Brownfield Community-wide Assessment Grant. The Grants Coordinator will also be responsible for ensuring the project is conducted in compliance with the terms and conditions of the Cooperative Agreement (CA) and the approved work plan to include quarterly reports and any other reporting requirements under the CA. The Grants Coordinator will maintain detailed accounting records and source documentation pertaining to EPA grant expenditures for 3 years after submission of the Final Report to verify the amount and percentage of grant funds expended for eligible programmatic costs, and ensure that the County complies with Office of Management and Budget (OMB) Circular A87 when charging costs.

### **b. Audit Findings**

The County did not have any adverse audit findings on the recently completed EPA Brownfield Community-wide Assessment Grant.

### **c. Past Performance and Accomplishments**

#### **i. Currently or Has Received an EPA Brownfields Grant**

The County has received and successfully managed an EPA Brownfields Community-wide Assessment Grant consisting of a Hazardous Substances Assessment Grant (\$200,000) and a Petroleum Grant (\$200,000) from 2009 through 2014.

#### **1. Compliance with Grant Requirements**

The County maintained compliance with the work plan, schedule and terms and conditions of the previous grant. The County applied and was granted time extensions to the both the Hazardous Substances and Petroleum Grants in order to most effectively use the funds on key sites. The Hazardous Substances Grant was completely expended and closed in July 2013 while the Petroleum Grant was completely expended and closed in February 2014. All quarterly and technical reporting were completed in a timely manner and completed projects were documented in ACRES.

#### **2. Accomplishments**

Implementation of the Hazardous Substances and Petroleum Assessment Grants resulted in the completion of 13 Phase I ESAs, 14 Phase II ESAs/Baseline Environmental Assessments and 6 Cleanup Plans. Four Phase I ESAs, 4 Phase II ESAs and 3 Cleanup Plans were successfully completed. Developer interest has been generated not only for the catalyst brownfield sites in the Targeted Community, but also other nearby priority brownfields in each of the identified areas within this grant request.

## **ATTACHMENT 1**

### **THRESHOLD CRITERIA**

## THRESHOLD DOCUMENTATION

1. **Applicant Eligibility:** Allegan County is a “general purpose unit of local government” in the State of Michigan and represent eligible local units of government under 40 CFR Part 31.
2. **Letter from the State:** Attachment 2 includes a letter from the Michigan Department of Environmental Quality (MDEQ).
3. **Community Involvement:** Allegan County has outlined how it intends to inform and involve the community and other stakeholders during the planning, implementation and assessment activities in Section 3 of the proposal narrative. Additionally community groups have pledged their commitment to the outreach process in Attachment 4.
4. **Site Eligibility and Property Ownership Eligibility:** Not applicable

**ATTACHMENT 2**

**LETTER FROM THE STATE OF MICHIGAN**





RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

December 2, 2015

Ms. Nora Balgoyen-Williams  
Director of Economic Development  
3283 122<sup>nd</sup> Avenue  
Allegan County, Michigan 48010

Dear Ms. Balgoyen-Williams:

SUBJECT: Michigan Department of Environmental Quality Acknowledgment of a United States Environmental Protection Agency (USEPA) Brownfield Grant Proposal for 2016

Thank you for your notice and request for a letter of acknowledgment for Allegan County's proposal to the United States Environmental Protection Agency (EPA) brownfield grant program. The Department of Environmental Quality, Remediation and Redevelopment Division (RRD), encourages and supports county-wide assessment and redevelopment efforts. Our review of your intended project meets the USEPA's requirements under the proposal guidelines.

Allegan County is applying for a combined \$400,000 hazardous substances and petroleum assessment grant which could be used to conduct assessment activities at eligible brownfield sites and facilitate new redevelopment projects in the county. The RRD recognizes that Allegan County was successful in implementing previous EPA brownfield grants. Allegan County as the applicant is considered eligible for the grant as a unit of county government.

Should the EPA award the brownfield grant to Allegan County, it would initiate redevelopment and reuse of underutilized and contaminated properties and improve the economic development and environmental conditions in the county. If you need further information or assistance regarding specific brownfield sites, please contact me at the number below or by email at [smedley@michigan.gov](mailto:smedley@michigan.gov).

Sincerely,

Ronald L. Smedley  
Brownfield Redevelopment Coordinator  
Brownfield Redevelopment Unit  
Remediation and Redevelopment Division  
517-284-5153

cc: Carrie Geyer

## **ATTACHMENT 3**

### **DOCUMENTATION OF LEVERAGED FUNDS COMMITTED TO THE PROJECT**



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



DAN WYANT  
DIRECTOR

December 11, 2015

Ms. Nora Balgoyen-Williams, CBSP  
Director of Economic Development  
Allegan County  
3255 122<sup>nd</sup> Avenue, Suite 101  
Allegan, MI 49010-9511

Dear Ms. Balgoyen-Williams:

SUBJECT: Village of Douglas Contamination, Site ID 0300032

Thank you for your inquiry regarding the funding status of the Village of Douglas Contamination site, which includes the former Chase Manufacturing property. The Department of Environmental Quality (DEQ) Remediation and Redevelopment Division (RRD) has allocated \$4,080,000 to the site, of which approximately \$2,700,000 has been spent to date to investigate the extent of groundwater contamination and operate and maintain the air sparge soil vapor extraction system. The DEQ committed \$1,360,000 to spend in Fiscal Year 2015, which will be used to prevent contaminated groundwater from being discharged to Wicks Creek and Kalamazoo Lake. The 2015 funding is targeted to implement a final remedy to address discharges to surface water, and not directly support brownfield redevelopment.

The DEQ understands that you intend to apply for a \$400,000 community-wide assessment grant from the U.S. Environmental Protection Agency to assess key brownfield redevelopment areas, including the former Chase Manufacturing property and surrounding area. We will continue to provide information to the County on additional brownfield sites as we did in preparation for your grant application submittal.

The DEQ has and will continue to participate in community outreach meetings in the City of Douglas and Allegan County. If you have any questions, or would like to discuss any of these items, please contact Mr. Ray Spaulding, Project Manager, Kalamazoo District Office, Remediation and Redevelopment Division, DEQ, 7953 Adobe Road, Kalamazoo, MI 49009; at phone number 269-567-3532; via email at [spauldingr1@michigan.gov](mailto:spauldingr1@michigan.gov); or you may contact me at the number listed below.

Sincerely,

Frank Ballo, District Supervisor  
Remediation and Redevelopment Division  
Kalamazoo District Office  
269-567-3531  
[ballof@michigan.gov](mailto:ballof@michigan.gov)

cc: Mr. Ray Spaulding, DEQ



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

December 8, 2015

Nora Balgoyen-Williams, CBSP  
Director of Economic Development  
Allegan County  
3255 122<sup>nd</sup> Ave. Suite 101  
Allegan, MI 49010

Subject: Letter of Support – USEPA Brownfield Assessment Grant, Allegan County, Michigan

The Michigan Department of Environmental Quality (DEQ) - Remediation and Redevelopment Division's Brownfield Redevelopment Unit supports your efforts to secure a U.S. Environmental Protection Agency (USEPA) Brownfield Site-specific Assessment Grant that includes the former Chase Manufacturing Site (Site) in Douglas, Michigan. This assessment is an important step in eliminating environmental data gaps that will allow the property to be redeveloped.

The DEQ has grant, loan, and tax increment financing programs intended to incent redevelopment of brownfields. Since our initial meetings on this Site and your application to the USEPA last year, a developer has committed to redevelop the property. As a result of that commitment, in November 2015 the DEQ agreed to recommend a \$500,000 brownfield grant and a \$350,000 brownfield loan for a vapor mitigation system and other environmental costs required to redevelop the Site. Our recommendation assumes funds are available once we receive the grant/loan application, and is predicated on approval of the proposed grant and loan by the State Administrative Board and the Director of the DEQ. These funds would be separate and in addition to the funding already being provided by DEQ for the off-site contaminant plume remediation and monitoring.

I look forward to hearing more about this potential brownfield project in the near future.

Sincerely,

Susan Wenzlick,  
Brownfield Redevelopment Coordinator  
Brownfield Redevelopment Unit  
Remediation and Redevelopment Division  
231-876-4422

## **ATTACHMENT 4**

### **LETTERS OF COMMITMENT FROM COMMUNITY ORGANIZATIONS**

December 10, 2015



Nora Balgoyen-Williams, CBSP  
Director of Economic Development  
Allegan County  
3255 122<sup>nd</sup> Ave., Suite 101  
Allegan, MI 490010

Subject: Allegan County EPA Brownfield Assessment Grant Application

Dear Ms. Balgoyen-Williams:

The Kalamazoo River Watershed Council (KRWC) enthusiastically supports Allegan County's efforts to secure an EPA Brownfield Community-wide Assessment Grant for high priority brownfields throughout the County, especially along the Kalamazoo River corridor. The KRWC has been a leader in advocating for the assessment and cleanup of polychlorinated biphenyls (PCB) by state and federal agencies and potentially responsible parties as part of the Kalamazoo River and Portage Creek Superfund process. The KRWC was instrumental in facilitating the removal of the Plainwell dam and associated PCB cleanup in the impoundment. The KRWC continues to advocate for PCB cleanup and the removal of three large dams along the Kalamazoo River in Allegan County.

The KRWC believes the Superfund process and our river system benefit greatly from community involvement, and we are committed to facilitating local input into the cleanup in Allegan County. Furthermore, the cleanup of contaminated properties and the restoration of in-stream and shoreline habitat are key components to removing beneficial use impairments and the eventual delisting of the Kalamazoo River Area of Concern (AOC). These activities must happen in conjunction with the Superfund process, which is working incrementally from upstream to downstream to remove contaminated river sediments.

As part of our commitment to facilitating the eventual delisting of the AOC, the KRWC is willing to assist in outreach activities as part of the EPA Brownfield Assessment Grant and to help integrate these brownfield redevelopment activities with outreach activities related to the Kalamazoo River Superfund site, whenever possible. The KRWC supports the County as it seeks assessment grant funds and looks forward to working with the County as they begin cleaning up and redeveloping the brownfields that are concentrated along the river corridor, where there is the most potential for improved public access and use of the river.

Sincerely,

A handwritten signature in cursive script that reads "Jamie McCarthy".

Jamie McCarthy  
Watershed Coordinator

*The Kalamazoo River Watershed Council is a public, non-profit 501(c)3 organization whose purpose is to work collaboratively with the community, government agencies, local officials and businesses to improve and protect the health of the Kalamazoo River, its tributaries, and its watershed.*

# Kalamazoo Lake Harbor Authority

December 11, 2015

Nora Balgoyen-Williams, CBSP  
Director of Economic Development  
Allegan County  
3255 122<sup>nd</sup> Ave., Suite 101  
Allegan, MI 49010

Dear Ms. Balgoyen-Williams:

Please accept this letter as support for the County's submittal of a United States Environmental Protection Agency (EPA) Brownfield Community-wide Assessment Grant application. It is my understanding that two of the targeted areas for assessment and cleanup planning within the County are located within the City of the Village of Douglas—including the former Chase Manufacturing Site and a privately owned marina that is being considered for acquisition by Douglas officials for a potential public marina and possible waterfront development. In the past, the Kalamazoo Lake Harbor Authority (KLHA) has shown support for the assessment, cleanup and promoting discussions regarding redevelopment of key brownfield sites in these areas.

As Chair of the KLHA, I will commit to adding to the regular meeting agenda a placeholder under REPORTS to hear periodic updates regarding any assessment, cleanup planning and remediation activities completed as part of the grant and brownfield redevelopment program. This will assist to expand community outreach activities regarding the condition of the lake's water quality and the impact of brownfields on the water quality. The KLHA is willing to be represented at community outreach activities or other functions in order to demonstrate support of and facilitate the investigation and remediation process.

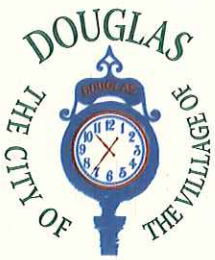
Sincerely,



Ken Trester, Chairperson  
Kalamazoo Lake Harbor Authority

Cc: Kalamazoo Lake Harbor Authority Board  
Jim Wiley, Mayor, City of Douglas  
Chris Peterson, Mayor, City of Saugatuck  
Kirk Harrier, City Manager, City of Saugatuck  
William LeFevere, City Manager, City of Douglas





*The Village of Friendliness ~ Since 1870*

December 10, 2015


Nora Balgoyen-Williams, CBSP  
Director of Economic Development  
Allegan County  
3255 122<sup>nd</sup> Ave., Suite 101  
Allegan, MI 49010

Dear Nora:

On behalf of the City of the Village of Douglas, please accept this letter as our endorsement for the Allegan County's submittal of a United States Environmental Protection Agency (EPA) Brownfield Community-wide Assessment Grant application. On at least four occasions over the past several years the City of Douglas has been a recipient of the funding provided under the EPA grant to Allegan County. Currently we have two projects that are targeted areas for assessment and cleanup planning within the City of Douglas including the former Chase Manufacturing Site and a private marina area that is being considered for acquisition by the City for use as a public marina and future waterfront redevelopment. The City of Douglas remains very supportive of the assessment, cleanup and redevelopment of key Brownfield sites in our community and throughout Allegan County.

The City of Douglas is committed not only to following through on the important projects we currently have before us but we also look forward to participating in the ongoing grant program through the submission of new sites for consideration of future funding and in support of the outreach by the Allegan County Brownfield Authority in all of their environmental assessment and cleanup planning activities throughout the County.

Sincerely,



William LeFevere, City Manager  
City of the Village of Douglas

Cc: Jim Wiley, Mayor, City of Douglas  
Chris Peterson, Mayor, City of Saugatuck  
Kirk Harrier, City Manager, City of Saugatuck  
Ken Trester, Chairperson, Kalamazoo Lake Harbor Authority



December 11, 2015

Nora Balgoyen-Williams, CBSP  
Director of Economic Development  
Allegan County  
3255 122<sup>nd</sup> Ave., Suite 101  
Allegan, MI 49010

RE: Letter of Support/Commitment

Dear Nora:

The City of Saugatuck supports Allegan County's submittal of an application to the United States Environmental Protection Agency (EPA) for the purposes of acquiring an EPA Brownfield Assessment Grant for brownfield sites throughout Allegan County and, if awarded, the City of Saugatuck commits to participating in the grant program by providing a list of brownfield sites for consideration to the Allegan County Brownfield Redevelopment Authority for environmental assessment and cleanup planning activities.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kirk Harrier', is written over a light blue horizontal line.

Kirk Harrier  
City of Saugatuck  
City Manager

# City of Plainwell

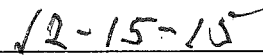
## RESOLUTION

### 15-21

Be it resolved that the City of Plainwell supports Allegan County's submittal of an application to the United States Environmental Protection Agency (EPA) for the purposes of acquiring an EPA Brownfield Assessment Grant for brownfield sites throughout Allegan County and, if awarded, commits to participating in the grant program by providing a list of brownfield sites for consideration to the Allegan County Brownfield Redevelopment Authority for environmental assessment and cleanup planning activities.



Signature



Date

Laketown Township  
4338 Beeline Road  
Allegan County  
Holland, MI 49423

### EXCERPTS OF MINUTES

At a regular meeting of the Board of Trustees of the Township of Laketown, Allegan County, Michigan held at the Felt Mansion, 6597 138<sup>th</sup> Avenue, Holland, Michigan, on the 9<sup>th</sup> day of December, 2015 at 7:00 p.m. local time.

PRESENT: Hofmeyer, Van Huis, Stielstra and Howell

ABSENT: Dewey

After certain other matters of business were concluded, the Supervisor stated that the next order of business was the consideration of a resolution regarding supporting a grant application to the Environmental Protection Agency. After discussion, the following resolution was offered by Stielstra and supported by Howell.

#### RESOLUTION 2015-15

##### Brownfield Assessment Grant Support Resolution

WHEREAS, the Allegan County Brownfield Redevelopment Authority has recommended to the Allegan County Board of Commissioners the submission of an Environmental Protection Agency Brownfield Assessment Grant application, and

WHEREAS, the Allegan County Board of Commissioners is expected to approve submitting this grant application in the near future, and

WHEREAS, if approved this grant will greatly assist in locating and identifying brownfield sites in Allegan County, and

WHEREAS, Laketown Township hereby commits to participating in this grant program if awarded,

NOW THEREFORE, BE IT RESOLVED that Laketown Township supports Allegan County's submittal of an application to the United States Environmental Protection Agency (EPA) for the purposes of acquiring an EPA Brownfield Assessment Grant for brownfield sites throughout Allegan County and, if awarded, commits to participating in the grant program by providing a list of brownfield sites for consideration to the Allegan County Brownfield Redevelopment Authority for environmental assessment and cleanup planning activities.

YES: Hofmeyer, Van Huis, Stielstra and Howell

NO: none

RESOLUTION DECLARED ADOPTED.

Dated: December 9, 2015

  
Wendy Van Huis, Clerk

### CERTIFICATE

I, the undersigned, the Clerk of the Township of Laketown, Allegan County, Michigan, do hereby certify that the foregoing is a true and complete copy of a resolution adopted by the Township Board at a regular meeting on the 9<sup>th</sup> day of December, 2015. I do further certify that the public notice of said meeting was given pursuant to and in full compliance with Michigan Act 267 of 1976, as amended, and that the minutes of said meeting were kept and will be or have been made available as required by said Act.

  
Wendy Van Huis, Clerk



Hopkins Township  
142 E. Main Street  
Allegan County  
Hopkins MI 49428

**EXCERPTS OF MINUTES**

At a regular meeting of the Board of Trustees of the Township of Hopkins, Allegan County, Michigan held at the Township Hall/ Library, 142 E. Main Street, Hopkins, Michigan, on the 14<sup>th</sup> day of December, 2015 at 7:30 p.m. local time.

PRESENT: Mark Evans, Lisa Battjes, Sandy Morris  
Chuck Wamhoff, Bob Modreske

ABSENT: None

After certain other matters of business were concluded, the Supervisor stated that the next order of business was the consideration of a resolution regarding supporting a grant application to the Environmental Protection Agency. After discussion, the following resolution was offered by Chuck Wamhoff and supported by Sandy Morris.

**RESOLUTION # 11-2015**

**Brownfield Assessment Grant Support Resolution**

WHEREAS, the Allegan County Brownfield Redevelopment Authority has recommended to the Allegan County Board of Commissioners the submission of an Environmental Protection Agency Brownfield Assessment Grant application, and

WHEREAS, the Allegan County Board of Commissioners is expected to approve submitting this grant application in the near future, and

WHEREAS, if approved this grant will greatly assist in locating and identifying brownfield sites in Allegan County, and

WHEREAS, Hopkins Township hereby commits to participating in this grant program if awarded,

NOW THEREFORE, BE IT RESOLVED that Hopkins Township supports Allegan County's submittal of an application to the United States Environmental Protection Agency (EPA) for the purposes of acquiring an EPA Brownfield Assessment Grant for brownfield sites throughout Allegan County and, if awarded, commits to participating in the grant program by providing a list of brownfield sites for consideration to the Allegan County Brownfield Redevelopment Authority for environmental assessment and cleanup planning activities.

YES: 5

NO: 0


RESOLUTION DECLARED ADOPTED.

Dated: December 14, 2015

Lisa Battjes  
Lisa Battjes, Clerk

### CERTIFICATE

I, the undersigned, the Clerk of the Township of Hopkins, Allegan County, Michigan, do hereby certify that the foregoing is a true and complete copy of a resolution adopted by the Township Board at a regular meeting on the 14 day of December, 2015. I do further certify that the public notice of said meeting was given pursuant to and in full compliance with Michigan Act 267 of 1976, as amended, and that the minutes of said meeting were kept and will be or have been made available as required by said Act.

A handwritten signature in black ink, appearing to read 'L Battjes', written over a horizontal line.

Lisa Battjes, Clerk





RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HEALTH AND HUMAN SERVICES  
LANSING

NICK LYON  
DIRECTOR

December 18, 2015

Ms. Nora Balgoyen-Williams, CBSP  
Director of Economic Development  
Allegan County  
3255 122nd Avenue, Suite 101  
Allegan, MI 49010

Dear Ms. Balgoyen:

The Michigan Department of Health and Human Services (MDHHS) is pleased to hear that Allegan County is submitting an application for an FY16 U.S. Environmental Protection Agency (EPA) Brownfields Assessment Grant. MDHHS has been working with the Michigan Department of Environmental Quality (MDEQ) and the City of Douglas since 2004 to ensure the protection of public health at a site of groundwater contamination in Douglas, one of your targeted brownfield areas.

Your plan for involving the targeted community and other stakeholders falls in line with MDHHS's commitment to provide outreach to persons impacted by environmental contaminants. MDHHS evaluates environmental data to determine if people are being exposed and provides communities with information to protect themselves from harmful levels of chemicals.

In support of your grant, if funded, MDHHS will provide health education to community members and property owners whose structures are at risk from chlorinated solvents and other contaminants. As necessary, MDHHS can provide additional information if other environmental public health concerns are discovered during the assessment.

Thank you for contacting us, and we look forward to supporting your project.

Sincerely,

A handwritten signature in black ink, appearing to read "Kory Groetsch".

Kory Groetsch  
Manager, Toxicology and Response Section

Cc: Christina Bush

# **ALLEGAN COUNTY HEALTH DEPARTMENT**

3255 – 122<sup>ND</sup> Ave., Suite 200, Allegan, MI 49010

## **Office Administration**

(269) 673-5411

## **Bioterrorism Preparedness**

(269) 686-4570

## **Personal Health**

(269) 673-5413

673-5415



## **Communicable Disease**

(269) 686-4524

## **Environmental Health**

(269) 673-5415

## **Resource Recovery**

(269)

December 3, 2015

Nora Balgoyen-Williams

3255 122<sup>nd</sup> Ave

Allegan, MI 49010

RE: FY 2016 U.S. EPA Brownfields Assessment Grant Application Community Support

Dear Ms. Balgoyen-Williams:

The Allegan County Health Department understands that Allegan County is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Assessment Grant. As part of the grant application, we understand that the County must secure support for the grant program. We believe that the grant project will benefit the community and support our mission to improve health and wellbeing of our community. We would like to offer our support for the project.

We have been actively involved in working with all sectors to improve the environmental and physical health in Allegan County. We work within Allegan County to provide services that foster a healthy environment. We know a healthy environment encourages not only economic vitality but also improved health outcomes of the community.

We will be a partner with the County and will collaborate with partner agencies to help identify/verify off-site health threats posed by identified brownfield contamination; identify related toxicological issues and perform risk evaluations; conduct notification/education programs; and coordinate health testing if migration of contamination from a brownfields site is confirmed.

We support the County as it seeks assessment grant funds and looks forward to working with the County as they begin cleaning up and redeveloping the brownfields that are impacting neighborhoods in the County.

Sincerely,

Angelique Joyner, MPH, RN

Health Officer

Allegan County Health Department

3255 122<sup>nd</sup> Ave Suite 200

Allegan, MI 49010



**Congress of the United States**  
**House of Representatives**

December 11, 2015

The Honorable Gina McCarthy  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington DC 20460

Administrator McCarthy:

I write today to bring your attention to the Environmental Protection Agency Brownfield Assessment grant application submitted by Allegan County, Michigan. It is without reservation that I support this grant application, and ask for your thorough consideration.

If received, the grant would bolster the redevelopment efforts along the Kalamazoo River Corridor which has suffered economically from the Superfund site designation and the economy. This location is integral to the future success of the County's revitalization plan using the river as an economic driver. In addition to the public health concerns from the contamination at the catalyst brownfield areas that have been identified, the contamination has greatly minimized the interest of outside development and investment. The creation of a market based and community supported development plan for this property will strengthen the economic and environmental health of the region.

The community support for this project is evident through the adoption of a resolution by the County Commission for this grant application. The funds will allow the County to further explore the full scope of contamination in a number of communities, identify the sources of that contamination, and ready options for site remediation.

I thank you in advance for ensuring this grant application receives full consideration. Please keep me advised on the progress of this application. Should you have any questions or desire additional information, please do not hesitate to contact me directly. In addition, Mr. Mike Ryan in my St. Joseph District Office, (269) 982-1986, can serve as a resource for additional information regarding this grant application and project.

Sincerely,

Fred Upton  
Member of Congress

Cc: Ms. Susan Hedman, Region 5 Administrator

**DC OFFICE:**

☐ 2183 RAYBURN HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515-2206  
(202) 225-3761  
FAX: (202) 225-4986

**MICHIGAN HOME OFFICES:**

☐ 157 SOUTH KALAMAZOO MALL  
SUITE 180  
KALAMAZOO, MI 49007  
(269) 385-0039  
FAX: (269) 385-2888

☐ 720 MAIN STREET  
ST. JOSEPH, MI 49085  
(269) 982-1986  
FAX: (269) 982-0237

<http://upton.house.gov>

**Application for Federal Assistance SF-424**

\* 1. Type of Submission:

- ☐ Preapplication
- ☒ Application
- ☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New
- ☐ Continuation
- ☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

12/18/2015

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\* a. Legal Name:

Allegan County Brownfield Redevelopment Authority

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

38-1914307

\* c. Organizational DUNS:

8317092870000

**d. Address:**

\* Street1:

3283 122nd Avenue

Street2:

\* City:

Allegan

County/Parish:

Allegan

\* State:

MI: Michigan

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

49010-9511

**e. Organizational Unit:**

Department Name:

Division Name:

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

Ms.

\* First Name:

Nora

Middle Name:

\* Last Name:

Balgoyen-Williams

Suffix:

Title:

Director

Organizational Affiliation:

Economic Development

\* Telephone Number:

269-686-5311

Fax Number:

269-686-5214

\* Email:

nbalgoyen@allegancounty.org

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OSWER-OBLR-15-04

\* Title:

FY16 Guidelines for Brownfields Assessment Grants

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

APPLICATION FOR FY16 USEPA BROWNFIELDS COMMUNITY-WIDE ASSESSMENT GRANT  
ALLEGAN COUNTY BROWNFIELD REDEVELOPMENT AUTHORITY

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="400,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="400,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed: